

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Alexandria Division*

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	CRIMINAL NO. 1:04-cr-385
ALI AL-TIMIMI,	)	
	)	
Defendant.	)	

**Government's First Proffer to Supplement the Record as to the  
Defendant's Emergency Motion for Bail Pending Appeal**

In light of new factual developments, the government makes the following proffer to the  
Court and to defense counsel:

- On July 17, 2020, the undersigned learned from counsel at the Bureau of Prisons and the U.S. Attorney's Office for the District of Colorado that a staff member who works at the Federal Correctional Institution at FCC Florence has tested positive for COVID-19.
- The staffer in question was last present at FCC Florence on July 16, 2020.
- The staff member works at FCI Florence, which, while within the FCC Florence complex, is separate from the ADX facility where the defendant is housed.

Respectfully submitted,

G. Zachary Terwilliger  
United States Attorney

By: \_\_\_\_\_ /s/

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**Certificate of Service**

I certify that July 17, 2020, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: \_\_\_\_\_ /s/

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